

UNITED STATES EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	Criminal No.: 2:2005 CR 00043-MAM
	:	
v.	:	
	:	
SOK NOU	:	
	:	

DEFENDANT'S MOTION TO TERMINATE SUPERVISION

Defendant moves this Court to terminate his supervision with the U.S. Department of Parole and Probation and represents the following.

1. Defendant was indicted on federal drug charges in 2005 in the Eastern District of Pennsylvania. The defendant was convicted, incarcerated, and released from Federal Custody in 2012.
2. Defendant's Counsel is admitted to practice before the Eastern District of Pennsylvania.
3. While incarcerated, the defendant made good use of his time, completing drug education programs, occupational training and working for UNICORP.
4. Upon release, the defendant's sentence was reduced pursuant to the attached order.
5. The defendant was compliant with all the rules and regulations regarding his federal supervision.
6. The defendant is employed and has a supportive group of family and friends who continue to encourage and laud his efforts towards living a life as a law-abiding citizen subsequent to his release.

7. The defendant seeks to have his supervision terminated or in the alternative to be placed on non-reporting supervision.

Wherefore, Defendant respectfully requests that this Honorable Court terminate his Federal supervision or in the alternative to be placed on non-reporting supervision.

Respectfully submitted,

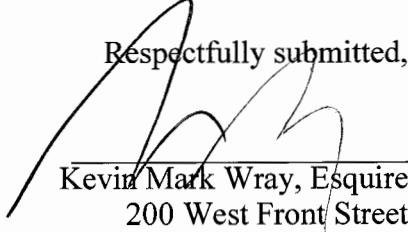

Kevin Mark Wray, Esquire
200 West Front Street
Media, PA 19063
(610) 810-2999
Attorney for Defendant

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

:
:
:
v.

CRIMINAL NUMBER 05-043-01

FILED

JAN 05 2012

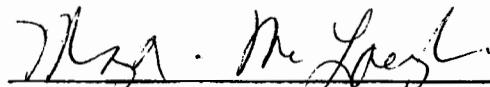
MICHAEL E. KUNZ, Clerk
By Dep. Clerk

ORDER

SOK NOU
Fed. Reg. No. 59310-066

And now this 5 day of January, 2012, pursuant to 18 U.S.C. § 3582(c)(2) and by agreement of the parties, it is hereby ORDERED that the term of imprisonment in this case is reduced from 135-120 months. All other terms and conditions of the original sentence are to remain the same.¹

BY THE COURT:



THE HONORABLE MARY A. McLAUGHLIN
United States District Court Judge

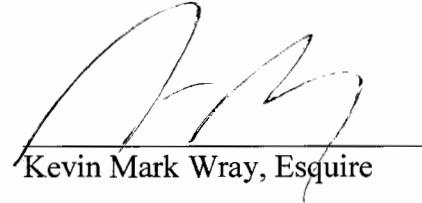
¹ Section 1B1.10 of the Sentencing Guidelines requires that, in determining whether to reduce a sentence based on a retroactive amendment, the Court must consider any impact on public safety. In this case, the government advises the Court that, apart from the information about the defendant's criminal conduct and history which was known and addressed at the initial sentencing proceeding in this case, the government is not aware of any other conduct since sentencing which suggests that the defendant poses a danger to any person or the community.

OC. *BONNIE McKEON, Asst*
CHRISTY UNTERBERGER,
DEPUTY CLERK
PROSECUTOR
PA 251412.

VERIFICATION

I, Kevin Mark Wray, attorney for the defendant in this matter, hereby verify that the statements made in the foregoing Motion/Petition are true and correct to the best of my knowledge, information or belief. The undersigned understands that false statements herein are made subject to the penalties of 18 USC §2706, relating to penalty of perjury.

Date: 8/8/16



Kevin Mark Wray, Esquire

UNITED STATES EASTERN DISTRICT OF PENNSYLVANIA

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CERTIFICATION OF SERVICE

I hereby certify that I have this day served a copy of the foregoing document upon the person in the manner indicated below, which service satisfies the requirement of the Federal Rules of Criminal Procedure.

Service by first-class U.S. mail addressed to:

US Attorney's Office
Eastern District of Pennsylvania
615 Chestnut Street #1250
Philadelphia, PA 19106

US District Court Clerk
Eastern District of Pennsylvania
601 Market Street #2609
Philadelphia, PA 19106

8/8/2016
Date


KEVIN MARK WRAY, ESQ.

Attorney for Defendant